

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ERICSSON INC., et al.,

Plaintiffs,

vs.

D-LINK CORPORATION, et al.,

D-Links.

Civil Action No. 6:10-cv-473

JURY TRIAL DEMANDED

AMENDED JOINT SUBMISSION OF PROPOSED JURY MATERIALS

Plaintiffs Ericsson Inc. and Telefonaktiebolaget LM Ericsson, (collectively “Ericsson” or “Plaintiff”) and all Defendants, D-Link Systems, Inc. (“D-Link”), NETGEAR, Inc. (“Netgear”), Acer, Inc., Acer America Corporation, Gateway, Inc. (together “Acer”), Dell Inc. (“Dell”), Toshiba America Information Systems, Inc., Toshiba Corporation (“Toshiba”), and Belkin International, Inc. (“Belkin”), and Intervenor Intel Corporation (“Intel”) (collectively “Defendants”) hereby submit the following proposed jury materials:

Attached as Exhibit A hereto are the parties’ Joint Proposed Jury Instructions, containing:

Ex. 1: Proposed Preliminary Instructions

Ex. 2: Proposed Deposition Instruction (to be read prior to the introduction of the first testimony by deposition)

Ex. 3: Proposed Limiting Instructions (to be read when evidence subject to limiting instruction is introduced).

Ex. 4: Proposed Final Instructions

Ex. 5: Proposed Willfulness Instructions (to be presented during willfulness phase)

Attached as Exhibit B hereto is Ericsson's proposed verdict form for the primary phase of trial.

Attached as Exhibit C hereto is Ericsson's proposed verdict form for the willfulness phase of trial.

Attached as Exhibit D hereto is Defendants' proposed verdict form for the primary phase of trial.

Attached as Exhibit E hereto is Defendants' proposed verdict form for the willfulness phase of trial.

The parties offer these amended jury materials in view of the Courts' recent orders and to conform the jury materials to the reduction of issues and the Court's bifurcation of willfulness from the primary phase of the case. The parties reserve the right to amend, supplement, or modify these proposed jury materials as the case proceeds, and as the parties continue to meet and confer regarding these materials. Additionally, the parties do not waive any objections to issues that were the subject of pending or anticipated motions, including *Daubert* motions, motions for summary judgment, and motions *in limine*.

DATED: June 3, 2013

Respectfully submitted,

By: /s/ Theodore Stevenson III

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on Monday, June 03, 2013. Local Rule CV-53(a)(3)(A).

/s/ *Brandon M. Jordan*
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